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Glenn Lurie, Joseph A. Ferraro, and
Izilda P. Martins, and Nominal
Defendant Avis Budget Group, Inc.*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

PAULA DEANGELIS,

Plaintiff,

v.

BERNARDO HEES, JAGDEEP PAHWA,
ANU HARIHARAN, LYNN KROMINGA,
GLENN LURIE, KARTHIK SARMA,
JOSEPH A. FERRARO, IZILDA P.
MARTINS and SRS INVESTMENT
MANAGEMENT LLC,

Defendants,

AVIS BUDGET GROUP, INC.,

Nominal Defendant.

No. 2:24-cv-05687-JXN-JSA

Document Filed Electronically

**ORAL ARGUMENT
REQUESTED**

RETURN DATE: February
18, 2025

**NOTICE OF MOTION TO
DISMISS**

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PLEASE TAKE NOTICE that on February 18, 2025, or such other time and date as set by the Court, Defendants Bernardo Hees, Anu Hariharan, Lynn Krominga, Glenn Lurie, Joseph A. Ferraro, and Izilda P. Martins, and Nominal Defendant Avis Budget Group, Inc. (the “Defendants”), will move before the Honorable Julien Xavier Neals, Judge of the United States District Court for the District of New Jersey, Martin Luther King Building & U.S. Courthouse, 50 Walnut Street, Newark, New Jersey 07102, for entry of an Order granting Defendants’ Motion to Dismiss Plaintiff’s Amended Verified Stockholder Derivative Complaint with prejudice.

PLEASE TAKE FURTHER NOTICE that, in support of the within motion, Defendants rely upon the accompanying Memorandum of Law in Support of their Motion to Dismiss Plaintiff’s First Amended Verified

Stockholder Derivative Complaint and the Declaration of Kristina A. Bunting, as well as the exhibits and attachments thereto.

PLEASE TAKE FURTHER NOTICE that a proposed form of Order is being submitted herewith.

PLEASE TAKE FURTHER NOTICE that, pursuant to Local Civil Rule 78.1(b), the Avis Defendants request oral argument on this motion.

Dated: November 18, 2024

Respectfully submitted,

s/ Samuel I. Portnoy

s/ Audra J. Soloway

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